

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR RECORD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

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|---|---------------------|
| Operator: WHITE COUNTY HOUSING AUTHORITY | Operator ID#: 39072 |
| Inspection Date(s): 1/31/2014 (Half) | Man Days: 0.5 |
| Inspection Unit: WHITE COUNTY HOUSING AUTHORITY | |
| Location of Audit: Olney | |
| Exit Meeting Contact: Mike Wendling, USDI | |
| Inspection Type: Standard Inspection - Record Audit | |
| Pipeline Safety Representative(s): Jim Watts | |
| Company Representative to Receive Report: Brad Raley | |
| Company Representative's Email Address: bradr@ilgas.com | |

| | | |
|-----------------------------------|--|-----------|
| Headquarters Address Information: | 1927 Miller Drive Olney, IL 62450 Emergency Phone#: Fax#: | |
| Official or Mayor's Name: | Darin Houchin Phone#: (618) 392-5502 Email: | |
| Inspection Contact(s) | Title | Phone No. |
| Mike Wendling | 1927 Miller Drive | |
| Mike Wendling | Gas Engineer - USDI | |

| Gas System Operations | Status |
|---|--|
| Gas Transporter | Crossville, Grayville and Norris City Municipals |
| Annual Report (Form 7100.1-1) reviewed for the year: | Not Applicable |
| <u>General Comment:</u> <i>This is a Master Meter Operator and they are not required to file DOT annual reports.</i> | |
| Unaccounted for Gas | Not Applicable |
| <u>General Comment:</u> | |

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| <i>No calculated due to the Master Meter not being required to file an annual report.</i> | | |
| Number of Services | | Not Checked |
| <u>General Comment:</u> <i>USDI does not maintain a service count as they do not file an annual report.</i> | | |
| Miles of Main | | 1.1 |
| Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP) | | Satisfactory |
| <u>General Comment:</u> <i>The operator has no test records from the installation so they are using the prior operating history and have established the MAOP at 7 inches water column ("in w.c.").</i> | | |
| Operating Pressure (Feeder) | | Not Applicable |
| <u>General Comment:</u> <i>White County has no feeder systems.</i> | | |
| Operating Pressure (Town) | | 7 inches water column |
| Operating Pressure (Other) | | Not Applicable |
| <u>General Comment:</u> <i>There are no other pressure systems.</i> | | |
| MAOP (Feeder) | | Not Applicable |
| <u>General Comment:</u> <i>No feeder piping.</i> | | |
| MAOP (Town) | | 7 inches water column |
| MAOP (Other) | | Not Applicable |
| <u>General Comment:</u> <i>No Other MAOP's</i> | | |
| Does the operator have any transmission pipelines? | | No |
| Regulatory Reporting Records | | Status |
| [191.5] | Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)? | Not Applicable |
| <u>General Comment:</u> <i>N/A No reportable incidents occurred in 2011-2013.</i> | | |
| [191.9(a)] | Was a DOT Incident Report Form F7100.1 submitted within 30 days after detection of an incident? | Not Applicable |

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| <u>General Comment:</u> | | |
| <i>Master Meter operators are not required to file written incident reports and there were no reportable incidents in 2011-2013.</i> | | |
| [191.9(b)] | Were any supplemental incident reports submitted when deemed necessary? | Not Applicable |
| <u>General Comment:</u> | | |
| <i>Not required to submit written incident reports because they are a Master Meter Operator.</i> | | |
| Did the operator have any plastic pipe failures in the past calendar year? | | No |
| <u>General Comment:</u> | | |
| <i>There were no plastic pipe failures in 2011-2013.</i> | | |
| Did the operator take action to mitigate safety concerns relating to the failure of the PE or pipeline components? | | No |
| <u>General Comment:</u> | | |
| <i>There were no failures on plastic piping in 2011-2013.</i> | | |
| [191.23(a)] | Did the operator report Safety Related Conditions? | Not Applicable |
| <u>General Comment:</u> | | |
| <i>There were no Safety Related conditions to report in 2011-2013.</i> | | |
| [191.25] | Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery? | Not Applicable |
| <u>General Comment:</u> | | |
| <i>There were no Safety Related Conditions to report in 2011-2013.</i> | | |
| [192.16(c)] | Customer Notification: Has the operator notified each new customer within 90 days about the customer's responsibility regarding buried piping, however, operators of a master meter may continuously post a general notice in a permanent location? | Satisfactory |
| <u>General Comment:</u> | | |
| <i>USDI provided a copy of the letter that is sent out annually in 2011-2013 and the posting that is placed at each of the White County Housing Offices that warns tenants that the Housing Authority is not responsible for any gas utilization equipment or piping installed by the tenant.</i> | | |
| DRUG TESTING | | Status |
| Refer to Drug and Alcohol Inspection Forms and Protocols | | Not Applicable |
| <u>General Comment:</u> | | |
| <i>Master Meter Operators are not required to have a drug testing program. The USDI personnel who under contract perform operation, maintenance and emergency response activities for White County Housing are currently in a qualified Drug and Alcohol testing program.</i> | | |
| TEST REQUIREMENTS | | Status |

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| [192.517(a)][192.505,192.507,192.511(c)] | Are pressure test records being maintained for piping operating above 100 psig? | Not Applicable |
| General Comment: <i>N/A No piping operating at or above 100 psig in the White County systems.</i> | | |
| [192.517(b)][192.511,192.509,192.513] | Are pressure test records being maintained for at least 5 years on piping operating below 100 psig? | Satisfactory |
| General Comment: <i>Test records are being maintained for the life of the system. A 12 inch segment of the outlet riser on a master meter was replaced at the Martin and 3rd Street site in Grayville, Illinois due to a leak detected in 2011. The leak was initially repaired with a bolt on leak clamp and was then permanently repaired by replacing a segment of the riser piping in January of 2012. USDI had recorded and retained the test records for this work.</i> | | |
| [192.603(b)][192.725] | Were service lines temporarily disconnected from the main properly tested prior to reconnection? | Satisfactory |
| General Comment: <i>The system at Martin and 3rd in Grayville, was tested prior to reinstating to system pressure.</i> | | |
| UPRATING | | Status |
| Category Comment: <i>No uprating was performed in 2011-2013 on the White County systems.</i> | | |
| [192.555][192.555] | Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS? | Not Applicable |
| [192.557][192.557] | Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS? | Not Applicable |
| OPERATIONS | | Status |
| [192.603(b)][192.605(a)] | Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months? | Satisfactory |
| General Comment: <i>The OM&E manual was reviewed as required in 2011-2013.</i> | | |
| Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months? | | Yes |
| General Comment: <i>The USDI/Illinois Gas OQ plan was reviewed as required in 2011-2013 and is conducted with the O&M review.</i> | | |
| [192.603(b)][192.605(b)(3)] | Are construction records, maps, and operating history available to operating personnel? | Satisfactory |
| General Comment: <i>USDI is maintaining current maps and the associated records for White County Housing. Field personnel have access to these records or maps at the Illinois Gas/USDI Office in Olney, Illinois.</i> | | |
| [192.603(b)][192.605(b)(8)] | Has the operator periodically reviewed personnel's work to | Not Applicable |

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| | determine the effectiveness of normal O&M procedures when deficiencies are found? | |
| <u>General Comment:</u> USDI/Illinois Gas is performing field evaluations of their personnel to determine if they are following current procedures and identified no issues with their procedures during the inspections performed in 2012-2013. | | |
| CONTINUING SURVEILLANCE RECORDS | | Status |
| [192.603(b)][192.613(a)] | Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions? | Satisfactory |
| <u>General Comment:</u> Continuing surveillance was conducted as required in 2011-2013. | | |
| [192.491][192.489] | Does the operator have records verifying if exposed cast iron was examined for evidence of graphitization and if necessary what appropriate action was taken concerning graphitization? | Not Applicable |
| <u>General Comment:</u> N/A No cast iron in the White County systems. | | |
| [192.603(b)][192.755] | Does the operator have surveillance records of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating and maintenance conditions? | Not Applicable |
| <u>General Comment:</u> N/A No cast iron in the White County systems. | | |
| [192.603(b)][192.753(a)] | Is each cast iron caulked bell and spigot joint that is subject to a pressure of more than 25 (psig.) sealed as required? | Not Applicable |
| <u>General Comment:</u> N/A No cast iron in the White County systems. | | |
| [192.603(b)][192.753(b)] | Is each cast iron caulked bell and spigot joint that is subject to a pressure of 25 (psig.) or less and is exposed for any reason sealed as required? | Not Applicable |
| <u>General Comment:</u> N/A No cast iron in the White County systems. | | |
| QUALIFICATION OF PIPELINE PERSONNEL | | Status |
| Refer to operator Qualification Inspection Forms and Protocols | | Yes |
| <u>General Comment:</u> | | |

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Due to USDI being a contractor for White County Housing and the Housing having no qualified personnel, Staff reviewed the Illinois Gas/USDI OQ plan during a separate audit conducted in January 2014.

| DAMAGE PREVENTION RECORDS | | Status |
|---|--|------------------------------|
| [192.603(b)][191.11(a)] | Did the operator track the number of damages per 1000 locate requests for the previous years? | Satisfactory |
| <p><u>General Comment:</u></p> <p><i>USDI performs all locates and retains the records for locate requests received for White County Housing. Due to this they can calculate the damages per 1000 locates. In 2011-2013 there were no damages to report due to third party excavation.</i></p> | | |
| Has the number of damages increased or decreased from prior year? | | Same in 2011-2013 No Damages |
| [192.603(b)][192.617] | Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence? | Satisfactory |
| <p><u>General Comment:</u></p> <p><i>There were no damages in 2011-2013.</i></p> | | |
| [192.603(b)][192.614(c)(3)] | Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system? | Satisfactory |
| <p><u>General Comment:</u></p> <p><i>Locate tickets were reviewed and found they were responded to and completed within the required intervals. Contact was made with the excavator when the area was clear.</i></p> | | |
| Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities? | | Yes |
| <p><u>General Comment:</u></p> <p><i>Supervisors are performing random job site evaluations to ensure their employees are completing the tasks as required by their procedures. Staff reviewed the completed evaluations and observed no issues.</i></p> | | |
| Do pipeline operators include performance measures in facility locating contracts? | | No |
| <p><u>General Comment:</u></p> <p><i>Performance measures are not utilized or required.</i></p> | | |
| [IL ADM. CO.265.100(b)(1)] | Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/ | Not Applicable |
| <p><u>General Comment:</u></p> <p><i>N/A No damages or violations to report in 2011-2013.</i></p> | | |
| Has the Operator adopted applicable section of the Common Ground Alliance Best Practices? | | Yes |
| <p><u>General Comment:</u></p> <p><i>Yes, Illinois Gas / USDI has adopted the applicable CGA best practices.</i></p> | | |

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| If no, were Common Ground Alliance Best Practices discussed with Operator? | | Not Applicable |
| <u>General Comment:</u> <i>They have adopted the applicable best practices.</i> | | |
| EMERGENCY PLANS | | Status |
| [192.603(b)][192.615(b)(1)] | Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan? | Satisfactory |
| <u>General Comment:</u> <i>Yes, emergency plans are provided to the supervisors.</i> | | |
| [192.603(b)][192.615(b)(2)] | Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective? | Satisfactory |
| <u>General Comment:</u> <i>Training was performed annually with all USDI/Illinois Gas personnel as required in 2011-2013.</i> | | |
| [192.603(b)][192.615(b)(3)] | Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency? | Not Applicable |
| <u>General Comment:</u> <i>N/A No emergencies occurred that required reviews to be conducted.</i> | | |
| [192.603(b)][192.615(c)] | Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials? | Satisfactory |
| <u>General Comment:</u> <i>Liaison was performed as required with the local emergency agencies.</i> | | |
| [192.603(b)][192.615(a)(3)] | Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved? | Satisfactory |
| <u>General Comment:</u> <i>Review of the 2011-2013 leak reports indicate they were responded to in a timely manner and corrective actions were taken when leaks or safety hazards were identified.</i> | | |
| PUBLIC AWARENESS PROGRAM - RECORDS | | Status |
| Refer to Public Awareness Program Inspection Forms and Protocols | | Not Checked |
| <u>General Comment:</u> <i>The Public Awareness protocols were not reviewed as part of this audit. Staff did review documentation indicating the housing authority has posted the natural gas safety awareness flyer in their offices at White County Housing.</i> | | |

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| ODORIZATION OF GAS | | Status |
|--|--|----------------|
| [192.603(b)][192.625(f)] | Has the operator maintained documentation of odorant concentration level testing using an instrument? | Satisfactory |
| <p><u>General Comment:</u></p> <p><i>Odorometer tests are performed in each of the three towns where White County has systems as required. These were performed by the municipals who serve the systems and were provided to USDI for permanent record as required in 2011-2013. USDI also performs an odorometer test when conducting the annual leak surveys.</i></p> | | |
| [192.603(b)][192.625(e)] | Has the operator maintained documentation of odorizer tank levels? | Not Applicable |
| <p><u>General Comment:</u></p> <p><i>N/A White County purchases odorized gas from the Municipal systems that serve their systems. White County has no odorizers in their systems.</i></p> | | |
| [192.603(b)][192.625(f)(1)] | Are master meter operators receiving written verification of odorant concentration levels from their gas supplier? | Satisfactory |
| <p><u>General Comment:</u></p> <p><i>Odorometer tests are performed in each of the three towns where White County has systems as required. These were performed by the municipals who serve the systems and were provided to USDI for permanent record as required in 2011-2013. USDI also performs an odorometer test when conducting the annual leak surveys.</i></p> | | |
| [192.603(b)][192.625(f)(2)] | Has the master meter operator maintained documentation of sniff tests performed as required by this section? | Satisfactory |
| <p><u>General Comment:</u></p> <p><i>USDI does perform annual odorometer tests during the leak survey to confirm the results they are receiving from the municipals.</i></p> | | |
| PATROLLING & LEAKAGE SURVEY | | Status |
| [192.603(b)][192.721(b)(1)] | Is the operator patrolling business districts at a minimum of 4 per year/4 1/2 months? | Not Applicable |
| <p><u>General Comment:</u></p> <p><i>N/A No Business Districts in the White County Systems.</i></p> | | |
| [192.603(b)][192.721(b)(2)] | Is the operator patrolling outside business districts at a minimum of 2 per year/7 1/2 months? | Satisfactory |
| <p><u>General Comment:</u></p> <p><i>Biannual patrols were conducted in the White County systems in 2011-2013.</i></p> | | |
| [192.603(b)][192.723(b)(1)] | Is the operator performing leakage surveys in business districts at a minimum of 1 per year/ 15 months? If the operator has inside meter sets that meet this criterion then were those surveyed? | Not Applicable |
| <p><u>General Comment:</u></p> <p><i>N/A No Business Districts in the White County Systems.</i></p> | | |
| [192.603(b)][192.723(b)(2)] | Is the operator performing leakage surveys outside a business district at a minimum of every 5 years/63 | Satisfactory |

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| | months? Is the operator performing leakage surveys on cathodically unprotected pipelines at a minimum of every 3 years/39 months? If the operator has inside meter sets that meet this criterion then were those surveyed? If the operator has yard lines then are those being surveyed? | |
| <u>General Comment:</u> Leak surveys were performed by USDI personnel annually in all of the White County systems in 2011-2013. | | |
| YARD LINES - RESIDENTIAL | | Status |
| <u>Category Comment:</u> White County has no yard lines in their systems. | | |
| [220 ILCS 2.2.03] | Has the operator designated and documented the location of all services where the meter is located more than 3 feet away from the wall of a residence? | Not Applicable |
| [192.463,220 ILCS 2.2.03][220 ILCS 2.2.03] | Has the operator determined if cathodic protection is required on these services? | Not Applicable |
| [192.723(b)(1),192.723(b)(2)][220 ILCS 2.2.03] | After the determination of the cathodic protection requirements, has the operator surveyed each line within the required leakage survey intervals? | Not Applicable |
| ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES | | Status |
| <u>Category Comment:</u> N/A No abandonments or deactivations were performed in 2011-2013. White County has no piping that crosses a navigable waterway. | | |
| [192.603(b)][192.727(b)] | Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas? | Not Applicable |
| [192.603(b)][192.727(c)] | Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas? | Not Applicable |
| [192.603(b)][192.727(d)] | Did the operator maintain documentation demonstrating that whenever service to a customer was discontinued access to gas was either; locked, prevented by a mechanical fitting, or disconnected from the gas supply and open pipe ends sealed? | Not Applicable |
| [192.603(b)][192.727(e)] | Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging? | Not Applicable |
| [192.727(g)][192.727(g)] | Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway? | Not Applicable |
| PRESSURE LIMITING AND REGULATION | | Status |

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| [192.603(b)][192.739(a)] | Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months? | Not Applicable |
| <u>General Comment:</u> <i>There is no pressure regulation/overpressure protection owned or operated by White County Housing. The Municipals own and operate the pressure regulators and provide overpressure protection.</i> | | |
| [192.603(b)][192.743(a)] | Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months? | Not Applicable |
| <u>General Comment:</u> <i>There is no pressure regulation/overpressure protection owned or operated by White County Housing. The Municipals own and operate the Pressure regulators and provide overpressure protection</i> | | |
| [192.603(b)][192.743(b)] | If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months? | Satisfactory |
| <u>General Comment:</u> <i>USDI has evaluated the pressure regulation and overpressure protection present to ensure they have sufficient capacity.</i> | | |
| [192.603(b)][192.741(a),192.741(b)] | Is each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating station, equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district? | Not Applicable |
| <u>General Comment:</u> <i>N/A All of the White County systems each have one source of supply. They are not currently monitored using pressure recording devices.</i> | | |
| [192.603(b)][192.741(c)] | If there were indications of abnormally high- or low-pressure, were actions taken to correct any unsatisfactory operating conditions? | Not Applicable |
| <u>General Comment:</u> <i>No reports of unusually high pressures were reported in 2011-2013.</i> | | |
| [192.603(b)][192.743(a),192.743(b),192.195(b)(2)] | Is overpressure protection provided by the supplier pipeline downstream of the take point? | Yes |
| [192.603(b)][192.743(a)] | If Yes, does the operator have documentation to verify that these devices have adequate capacity? | Satisfactory |
| <u>General Comment:</u> <i>USDI is to conduct a review the master meter installations and determine if they have adequate capacity to provide overpressure protection and determine if separate relief devices are present. If inadequate capacities are present, addition protection shall be installed.</i> | | |
| VALVE MAINTENANCE | | Status |
| [192.603(b)][192.747(a),192.747(b)] | Did the operator inspect and maintain distribution valves necessary for the safe operation of the system at a minimum of 1 per year/15 months? | Satisfactory |

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| <u>General Comment:</u> | | |
| Valve inspections were performed as required in 2011-2013. | | |
| [192.603(b)][192.749(a)] | Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months? | Not Applicable |
| <u>General Comment:</u> | | |
| N/A No Vaults in the White County Housing systems. | | |
| Investigation Of Failures | | Status |
| [192.603(b)][192.617] | Did the operator experience accidents or failures requiring analysis? | Satisfactory |
| <u>General Comment:</u> | | |
| There were no equipment or fitting failures or incidents in 2011-2013. The only leak was established to be due to disbonded coating on the outlet riser of the master meter. This was replaced and recoated. | | |
| WELDING OF STEEL PIPE | | Status |
| [192.603(b)][192.225(b)] | Does the operator have documentation for their qualified welding procedure? | Satisfactory |
| <u>General Comment:</u> | | |
| White County has adopted qualified welding procedures. | | |
| [192.603(b)][192.227,192.229] | Does the operator have documentation of welder qualification documentation as required? | Satisfactory |
| <u>General Comment:</u> | | |
| White County utilizes Illinois Gas welders and Mr. Hughes who completed the leak repair in 2012 was qualified. | | |
| [192.709][192.243(b)(2)] | Does the operator have documentation of NDT personnel qualification as required? | Not Applicable |
| <u>General Comment:</u> | | |
| N/A NDT testing is not required on distribution systems. | | |
| [192.709][192.243(f)] | Does the operator have documentation of NDT testing performed? | Not Applicable |
| <u>General Comment:</u> | | |
| N/A No NDT testing was performed / required in 2011-2013. | | |
| JOINING OF MATERIAL OTHER THAN WELDING | | Status |
| <u>Category Comment:</u> | | |
| No plastic piping was installed in the White County systems in 2011-2013. | | |
| [192.603(b)][192.285] | Are persons making joints with plastic pipe qualified? | Not Applicable |

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| [192.603(b)][192.287] | Are persons inspecting plastic pipe joints qualified? | Not Applicable |
| [192.603(b)][192.283] | Are qualified joining procedures for plastic pipe in place? | Not Applicable |
| <u>General Comment:</u> <i>The White County O&M has qualified joining procedures in place.</i> | | |
| CORROSION CONTROL RECORDS | | Status |
| [192.491(a)][192.491(a)] | Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system? | Satisfactory |
| <u>General Comment:</u> <i>White County / USDI have current maps of the systems and the necessary documentation for the corrosion systems protecting their facilities.</i> | | |
| [192.491][192.459] | Has the operator maintained documentation of an examination when buried pipe was exposed? | Not Applicable |
| <u>General Comment:</u> <i>No buried pipe was exposed in 2011-2013 to inspect. The one repair completed in 2012 was on above ground riser piping.</i> | | |
| [192.491][192.465(a)] | Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually? | Satisfactory |
| <u>General Comment:</u> <i>All piping in each system is protected as a single system. Annual pipe to soil surveys were conducted in 2011-2013 as required and indicate potentials at or above -1volt.</i> | | |
| [192.491][192.465(b)] | Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months? | Not Applicable |
| <u>General Comment:</u> <i>N/A No rectifiers in the White County Systems.</i> | | |
| [192.491][192.465(c)] | Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months? | Not Applicable |
| <u>General Comment:</u> <i>N/A There are no critical or non-critical bonds in the White County systems.</i> | | |
| [192.491][192.465(d)] | Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring? | Not Applicable |
| <u>General Comment:</u> | | |

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR RECORD AUDIT

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

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| <i>No deficiencies were identified during the monitoring performed in 2011-2013.</i> | | |
| [192.491][192.465(e)] | Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months? | Not Applicable |
| <u>General Comment:</u> <i>N/A There is no unprotected piping in the White County systems.</i> | | |
| [192.491][192.467(a),192.467(c),192.467(d)] | Has the operator maintained documentation of inspections or tests for electrical isolation at casings? | Not Applicable |
| <u>General Comment:</u> <i>There are no casings in the White County systems.</i> | | |
| [192.491][192.469] | Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection? | Satisfactory |
| <u>General Comment:</u> <i>Each riser connected to the protected steel system are utilized for test points and were read in each system annually in 2011-2013.</i> | | |
| [192.491][192.471] | Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive? | Not Applicable |
| <u>General Comment:</u> <i>No issues with test leads were identified during the monitoring performed in 2011-2013.</i> | | |
| [192.491][192.473(b)] | Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures? | Satisfactory |
| <u>General Comment:</u> <i>The White County systems are protected using anodes and tests are performed to ensure they are not affecting the municipals systems.</i> | | |
| [192.491][192.475(a)] | Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas? | Not Applicable |
| <u>General Comment:</u> <i>N/A White County receives pipeline quality gas from the municipal systems. They are not transporting corrosive gas.</i> | | |
| [192.491][192.475(b)] | Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason? | Satisfactory |
| <u>General Comment:</u> <i>Yes, the segment removed in 2012 was inspected and determined to be due to external corrosion. A pipe exam sheet was completed as required and indicated no issues with internal corrosion.</i> | | |
| [192.491][192.477] | Has the operator maintained documentation of internal | Not Applicable |

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| | corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months? | |
| <u>General Comment:</u> <i>N/A They are not transporting corrosive gas so coupons are not utilized. They have reported no indications of leakage or observations identifying wall loss due to internal corrosion.</i> | | |
| [192.491][192.481] | Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months? | Satisfactory |
| <u>General Comment:</u> <i>Atmospheric corrosion surveys were performed in 2008 and 2011 no issues was reported.</i> | | |
| [192.491][192.479] | Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered? | Satisfactory |
| <u>General Comment:</u> <i>The only corrosion observed was due to disbonded hot wrap coating that retained moisture and resulted in corrosion on a riser at the master meter at Martin and 3rd Street in Grayville, Illinois. The corrosion was initially repaired using a leak clamp, was later replaced with a new segment of steel piping and was recoated to protect against corrosion.</i> | | |
| [192.491][192.483(a), 192.483(b), 192.483(c)] | Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected? | Satisfactory |
| <u>General Comment:</u> <i>Documentation was completed indicating the external corrosion was replaced with a new segment of piping and was recoated to protect against atmospheric corrosion.</i> | | |
| TRAINING - 83 IL ADM. CODE 520 | | Status |
| [520.10(a) (1)] | Has the operator maintained documentation demonstrating that personnel have received adequate training? | Satisfactory |
| <u>General Comment:</u> <i>Staff reviewed the training records maintained for the Illinois Gas and USDI employees. No issues were identified.</i> | | |
| [520.10(a) (2)] | Do training records include verbal instruction and/or on the job training for each job classification? | Satisfactory |
| <u>General Comment:</u> <i>Yes, Illinois Gas is recording when verbal instruction is provided.</i> | | |
| [520.10(b)] | Has the municipal operator maintained documentation demonstrating that personnel have received adequate training? | Not Applicable |
| <u>General Comment:</u> <i>USDI / Illinois Gas is not a municipal operator. They do have training requirements specified in their training program.</i> | | |
| [520.10(a)(5)] | Are procedures periodically updated to include new materials, new methods of operation and installation, and | Satisfactory |

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| | changes in general procedures? | |
| <u>General Comment:</u> <i>Illinois Gas / USDI does perform training when procedures are revised or new procedures or equipment is utilized.</i> | | |

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